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10 Attorneys for Plaintiffs
11 DAKAVIA MANAGEMENT CORP.;
12 MONTE VISTA ESTATES, LLC; and
13 LAMAR ESTATES, LLC

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

DAKAVIA MANAGEMENT CORP., an
Oregon Corporation; MONTE VISTA ESTATES,
LLC, a Colorado Limited Liability Company; and
LAMAR ESTATES, LLC, a Colorado Limited
Liability Company,

Case No.: 1:20-cv-00448-NODJ-SKO

**JOINT STIPULATION AND ORDER
TO CONTINUE MARCH 7, 2024,
SCHEDULING CONFERENCE**

Judge: Hon. Judge Sheila K. Oberto

10 Plaintiffs,
11 v.
12 BRANDON BIGELOW, an individual, CURTIS
13 BIGELOW, an individual RICHARD A. GREEN, an
14 individual, RAZMIK ZAKARIAN, an individual,
15 INVIGORATE HEALTHCARE, INC., a California
16 Corporation, INVIGORATE HEALTHCARE, LLC,
17 a California Limited Liability Company,
18 INVIGORATE HEALTHCARE MANAGEMENT,
19 LLC, a California Limited Liability Company,
20 MONTE VISTA CARE HOLDINGS, LLC, a
21 California Limited Liability Company, LAMAR
22 HOLDINGS, LLC, a California Limited Liability
23 Company, LTC MANAGEMENT HOLDINGS,
24 LLC, a California Limited Liability Company, SNF
25 PAYROLL, LLC, a California Limited Liability
Company, SNF MANAGEMENT, LLC, a Delaware
Limited Liability Company, and CHAIM RASKIN,
an individual.

Defendants.

1 **TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE**
2 **EASTERN DISTRICT OF CALIFORNIA:**

3 IT IS HEREBY STIPULATED by and between the Plaintiffs DAKAVIA
4 MANAGEMENT CORP.; MONTE VISTA ESTATES, LLC; and LAMAR ESTATES, LLC, and
5 Defendants RICHARD A. GREEN, and RAZMIK ZAKARIAN (hereafter collectively the
6 "Parties") that the Scheduling Conference scheduled for March 6, 2024, respectively be continued
7 for at least 45 days (45) for the foregoing reasons.

8 (1) On October 3, 2023, the Court continued the Scheduling Conference in this matter until
9 March 6, 2024. [Dkt. 135]

10 (2) On December 6, 2023, the Parties participated in a mediation with Judge Lesley Holland
11 (ret.). Although the mediation was unsuccessful, the Parties have expressed an interest to continue
12 settlement discussions to seek a potential resolution.

13 (3) Pursuant to FRCP Rule 26(a)(1); FRCP Rule 26(f)(1), the Parties recently have met and
14 conferred about the upcoming March 6, 2024, Initial Scheduling Conference. As part of those
15 discussions, the Parties agree to and respectfully request a continuance of the current March 6,
16 2024, Scheduling Conference to permit the Parties additional time to continue settlement
17 discussions, including the sharing of discovery documents informally, in an attempt to avoid
18 further litigation in this matter.

19 Should a resolution not be reached, the Parties will present to the Court an efficient and
20 realistic joint scheduling report for the Court's approval seven days in advance of the new
21 Scheduling Conference.

22 As an additional matter, counsel for Plaintiff is unavailable in beginning March 6, 2024, in
23 a trial scheduled for what is anticipated to be a 4- week trial in Los Angeles Superior Court until
24 April 18, 2024.

25 For the foregoing reasons, the Parties stipulate to continuing the Scheduling Conference by at
26 least 45 days (45) as the court's schedule may permit.

1 DATED: March 1, 2024

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3 MURPHY, PEARSON, BRADLEY & FEENEY

4 By /s/ Bryan L. Saalfeld

5 Bryan L. P. Saalfeld
Hollyanne Gentile
6 Attorneys for Plaintiffs
DAKAVIA MANAGEMENT CORP.,
MONTE VISTA ESTATES, LLC &
LAMAR ESTATES, LLC

7
8 DATED: March 1, 2024

9 WHITNEY THOMPSON & JEFFCOACH LLP

10 By /s/Timothy Thompson

11 Timothy Thompson
Mandy Jeffcoach
12 Attorneys for Defendants
RICHARD A. GREEN, and RAZMIK ZAKARIAN

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ORDER

Based on the foregoing stipulation (Doc. 136), and good cause appearing, **IT IS HEREBY ORDERED** that the Scheduling Conference scheduled for March 7, 2024, is continued to May 9, 2024, at 9:30 AM before Magistrate Judge Sheila K. Oberto. The parties shall file their joint scheduling report by no later than seven (7) days prior to the Conference.

IT IS SO ORDERED.

Dated: March 1, 2024

/s/ Sheila K. Oberto

UNITED STATES MAGISTRATE JUDGE